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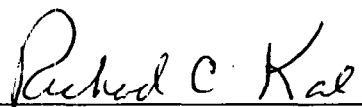
**SECOND FIVE-YEAR REVIEW REPORT**

**TOMAH FAIRGROUNDS LANDFILL SITE**

**CITY OF TOMAH MONROE COUNTY  
WISCONSIN**

**September 2007**

**Prepared by:  
United States Environmental Protection Agency  
Region 5  
Chicago, Illinois**

  
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9-21-07  
Date

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## **List of Acronyms**

<b>ARAR</b>	Applicable or Relevant and Appropriate Requirement
<b>ATSDR</b>	Agency for Toxic Substance and Disease Registry
<b>CERCLA</b>	Comprehensive Environmental Response, Compensation, and Liability Act
<b>U.S. EPA</b>	United States Environmental Protection Agency
<b>FIT</b>	Field Investigation Team
<b>CFR</b>	Code of Federal Regulations
<b>HRS</b>	Hazard Ranking System
<b>IC</b>	Institutional Controls
<b>MCL</b>	Maximum Contaminant Level
<b>MCLG</b>	Maximum Contaminant Level Goal
<b>NCP</b>	National Contingency Plan
<b>NPL</b>	National Priorities List
<b>O&amp;M</b>	Operation and Maintenance
<b>PCB</b>	Polychlorinated Biphenyl
<b>PRP</b>	Potentially Responsible Party
<b>RA</b>	Remedial Action
<b>RD</b>	Remedial Design
<b>RI/FS</b>	Remedial Investigation/Feasibility Study
<b>ROD</b>	Record of Decision
<b>USGS</b>	United States Geological Survey

**VOC** Volatile Organic Compound

**WDNR** Wisconsin Department of Natural Resources

## **Executive Summary**

The assessment of this second five-year review found that the remedy was implemented in accordance with the requirements of the Record of Decision (ROD). The U.S. EPA selected the remedy in the 1996 ROD. The ROD took into consideration the fact that the City of Tomah had entered into a consent order with the Wisconsin Department of Natural Resources (WDNR) under which the City agreed to conduct groundwater monitoring at the Site for at least ten years. It also took into consideration the fact that institutional controls (ICs) limiting use of the landfill property were already in existence. The trigger action for this second five-year review was the last five-year review completed on September 27, 2002.

The remedy for the Tomah Fairgrounds site in Tomah, Monroe County, Wisconsin is 'No Further Action'. The Site achieved construction completion with the signing of the Final Close Out Report in February 2001. The Site was delisted from the National Priority List (NPL) on August 2001 based on verified data that Wisconsin groundwater standards had been met. Landfill waste remains in place; hazardous substances, pollutants, or contaminants remain at the Site above levels that allow for unlimited use and unrestricted exposure. Therefore U.S. EPA is required to conduct a third Five-Year Review in another five years, September 2012.

The 'No Further Action' remedy selected in 1996 ROD continues to be protective of human health and the environment in the short term. The existing Site use is consistent with the objectives set forth in the ROD and zoning restrictions and the implemented remedial actions at the Tomah Fairgrounds Site are functioning as intended. Long-term protectiveness requires compliance with land use restrictions that prohibit interference with the soil cap and restrict the Site to limited commercial/industrial uses and limit the groundwater use to ensure that the remedy continues to function as intended. Compliance with ICs will be accomplished by planning for long-term stewardship which includes maintaining and monitoring effective ICs.

## Second Five-Year Review Summary Form

SITE IDENTIFICATION		
Site name (from WasteLAN): Tomah Fairgrounds Landfill		
EPA ID (from WasteLAN): WI980616841		
Region: 5	State: WI	City/County: Tomah / Monroe County
SITE STATUS		
NPL status: <input type="checkbox"/> Final <input checked="" type="checkbox"/> Deleted <input type="checkbox"/> Other (specify)		
Remediation status (choose all that apply): <input type="checkbox"/> Under Construction <input type="checkbox"/> Operating <input checked="" type="checkbox"/> Complete		
Multiple Ous?* <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Construction completion date: <u>2 / 13 / 2001</u>	
Has site been put into reuse? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
REVIEW STATUS		
Lead agency: <input type="checkbox"/> EPA <input checked="" type="checkbox"/> State <input type="checkbox"/> Tribe <input type="checkbox"/> Other Federal Agency		
Author name: David Linnear		
Author title: Remedial Project Manager	Author affiliation: U.S. EPA, Region 5	
Review period:** <u>1 / 8 / 2007</u> to <u>6 / / 2007</u>		
Date(s) of site inspection: <u>6/ 12 / 2007</u>		
Type of review: <input checked="" type="checkbox"/> Post-SARA <input type="checkbox"/> Pre-SARA <input type="checkbox"/> NPL-Removal only <input type="checkbox"/> Non-NPL Remedial Action Site <input type="checkbox"/> NPL State/Tribe-lead <input type="checkbox"/> Regional Discretion)		
Review number: <input type="checkbox"/> 1 (first) <input checked="" type="checkbox"/> 2 (second) <input type="checkbox"/> 3 (third) <input type="checkbox"/> Other (specify)		
Triggering action: <input type="checkbox"/> Actual RA On-site Construction at OU # ____ <input type="checkbox"/> Actual RA Start at OU# <u>NA</u> <input type="checkbox"/> Construction Completion <input checked="" type="checkbox"/> Previous Five-Year Review Report <input type="checkbox"/> Other (specify)		
Triggering action date (from WasteLAN): <u>9 / 27 / 2002</u>		
Due date (five years after triggering action date): <u>9 / 27 / 2007</u>		

\* ["OU" refers to operable unit.]

\*\* [Review period should correspond to the actual start and end dates of the Five-Year Review in WasteLAN.]

## **Second Five-Year Review Summary Form, cont'd.**

### **Issues:**

- In order for the remedy to be protective in the long term, effective ICs must be monitored and maintained.
- Parts of the Site have buried waste remaining.

### **Recommendations and Follow-up Actions:**

- Develop an IC Action Plan that includes a provision for evaluating whether effective ICs are being monitored and maintained. The IC plan should be developed within 6 months of the triggered due date to identify any violations, i.e. wells in violation of the well abandonment ordinance, or land use in violation of the deed restrictions.
- Develop a plan to investigate waste remaining in place.

### **Protectiveness Statement(s):**

The 'No Further Action' remedy selected in 1996 ROD continues to be protective of human health and the environment in the short term. The existing Site use is consistent with the objectives set forth in the ROD and zoning restrictions and the implemented remedial actions at the Tomah Fairgrounds Site are functioning as intended. Long-term protectiveness requires compliance with land use restrictions that prohibit interference with the soil cap and restrict the Site to limited commercial/industrial uses and limit the groundwater use to ensure that the remedy continues to function as intended. Compliance with ICs will be accomplished by planning for long-term stewardship which includes maintaining and monitoring effective ICs.



U. S. Environmental Protection Agency  
Region 5  
Second Five Year Review  
Tomah Fairgrounds Landfill Site  
Tomah, Monroe County, Wisconsin  
September 2007

## **I. Introduction**

The purpose of a five-year review is to determine whether the remedy at a site is protective of human health and the environment. The methods, findings, and conclusions of reviews are documented in Five-Year Review reports. In addition, five-year review reports identify issues found during the review, if any, and identify recommendations to address them.

The Agency is preparing this five-year review report pursuant to CERCLA §121 and the National Contingency Plan (NCP). CERCLA §121 states:

*If the President selects a remedial action that results in any hazardous substances, pollutants, or contaminants remaining at the site, the President shall review such remedial action no less often than each five years after the initiation of such remedial action to assure that human health and the environment are being protected by the remedial action being implemented. In addition, if upon such review it is the judgment of the President that action is appropriate at such site in accordance with section [104] or [106], the President shall take or require such action. The President shall report to the Congress a list of facilities for which such review is required, the results of all such reviews, and any actions taken as a result of such reviews.*

The Agency interpreted this requirement further in the NCP; 40 CFR 300.430(f) (4) (ii) states:

*If a remedial action is selected that results in hazardous substances, pollutants, or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure, the lead agency shall review such action no less often than every five years after the initiation of the selected remedial action.*

The United States Environmental Protection Agency (U.S. EPA) conducted the second five-year review of the remedy implemented at the Tomah Fairgrounds Landfill Site in Tomah, Monroe County, Wisconsin. This review was conducted by the Remedial Project Manager (RPM) for the Site from January 2007 through June 2007. This report documents the results of the review.

This is the second five-year review for the Site. The triggering action for this statutory review is the date of the first five-year review for the site in September 2002. The five-year review is required because hazardous substances, pollutants, or contaminants remain at the Site above levels that allow for unlimited use and unrestricted exposure. This review will be placed in the Site files and local repository for the Tomah Fairgrounds Superfund Site (the "Site") in Tomah, Wisconsin.

## **II. Site Chronology**

Table 1 lists a chronology of events for the Tomah Fairgrounds Landfill Site.

Event	Date
Initial discovery of Problem	1984
Listed on National Priority List	July 1987
Remedial Investigation/Feasibility Study	July 1993
ROD Signature	September 1996
Site Visit / Inspection	August 2000
Close Out Report	February 2001
NPL Delisting	August 2001
First Five-Year Review	September 2002
Second Five- Year Review	September 2007

## **III. Background**

### **Physical Characteristics**

The Tomah Fairground Landfill is located in the southeastern portion of the City of Tomah, Monroe County, Wisconsin. The property covers roughly 37.5 acres, with the landfill itself occupying about 15 acres within the boundaries of the Fairgrounds. The landfill area is a grass-covered, open field that is often used as a parking lot during Fairground events. The Site is bordered on the north by Grassman Street and a residential area. Fair Street runs along the eastern border, angles across the southeast corner and borders the Fairgrounds along the south. Access to the Site is not restricted.

### **Land & Resource Use**

A commercial/industrial area lies to the east of the Site. To the south and southwest are three homes with private drinking water wells and open fields. To the west is an open field. Besides the three homes to the south and southwest, the remaining residences around the Fairgrounds are supplied drinking water by the City of Tomah municipal service. Land use to the south and west is agricultural, to the east, commercial and to the north, residential. The Site is used as a parking lot during Fairground events. Currently, the Site is zoned industrial.

## **History of Contamination**

The Tomah Fairgrounds Landfill Site was operated by the City of Tomah as a disposal site from 1955 until 1960. Waste disposal methods consisted of excavating 6 to 8 feet of surface soil, land filling waste materials, placing a cover consisting of previously excavated topsoil and final grading. Some material disposed of in the landfill may have been burned before it was buried. No disposal records regarding the types or quantities of material buried were maintained.

Between 1984 and 2000, the Site was sampled on a number of occasions. In 1984, the U.S. EPA and WDNR performed a preliminary assessment. In 1991 and 1992 groundwater samples from residential wells around the landfill were collected. In 1993, the first phase of the Remedial Investigation (RI) began and was finalized in 1996. Based on results of the RI, it was determined that a Feasibility Study was not necessary. Based on information collected, associated risks to human health and the environment and the consideration of state soil standards, U.S. EPA concluded remediation of soil is not warranted under current or anticipated future land use as a year round active county fairground for a wide variety of local parking and organized activities.

In 1996, the Record of Decision (ROD) concluded 'No Further Action' was appropriate due to property implemented deed restrictions limiting land use and an agreement between the WDNR and the City of Tomah implementing monitored natural attenuation of groundwater requiring the City to conduct periodic groundwater monitoring. A groundwater investigation was completed by the WDNR and City of Tomah in 2000 which found no exceedances. Ground water in the vicinity of Tomah Fairgrounds is currently not used for drinking water purposes. Area residents are connected to municipal water services except for the 3 remaining private residential wells located to the south and southwest of the site. The 2000 investigation of these residential wells showed no exceedances and no health threat. Nevertheless, the first five-year review still found unlimited use / unrestrictive exposure inadvisable due to waste in place.

## **Initial Response**

Representatives of the WDNR and the U.S. EPA's Field Investigation Team (FIT) investigated the Site in 1984 to gain information for a preliminary assessment. A site inspection report was prepared and the site was scored using the Hazard Ranking System (HRS). The Site was placed on the National Priorities List (NPL) on July 21, 1987. The possible effects of disposal directly into an aquifer and the potential for direct contact with hazardous substances because of erosion of the landfill cap were the concerns raised during the preliminary assessment.

In January 1988, the Agency for Toxic Substances and Disease Registry (ATSDR) prepared a preliminary health assessment for the Site. The assessment lists a number of potential exposure routes including ingestion and dermal contact with ground water, surface water, and soils and inhalation of contaminated dusts or volatile compounds. The assessment was completed before the collection of any samples at the Site and thus recommended environmental characterization and sampling of the Site to address the environmental and human health exposure pathways.

In August 1991, WDNR collected groundwater from three residential wells south of the Fairgrounds. The samples were analyzed for volatile organic compounds (VOCs). Volatile organic compounds were not detected in any of the residential well samples.

In February 1992, U.S. EPA sampled groundwater in three residential wells near the Tomah Fairgrounds to confirm WDNR results. Analysis of the samples revealed no chemicals above state or federal standards.

In July 1993, U.S. EPA, WDNR and United States Geological Survey (USGS), conducted a Phase I remedial investigation (RI). The purpose of the Phase I RI was to collect groundwater and soil samples to characterize the nature and extent of contamination and associated exposure risk. Sampling indicated contaminants within the landfill boundary were present. Primary contaminants of concern in groundwater are lead, vinyl chloride and cis-1, 2-dichloroethene (cis-1, 2 DCE). Upgradient residential wells showed no contamination. Further field investigations for surface soils indicated the presence of contamination. In particular, heavy metals, including cadmium, chromium, lead, mercury, and selenium were found.

Research to identify parties responsible for conditions at the Tomah Fairgrounds was completed in December 1994. U.S. EPA named the City of Tomah as a potentially responsible party (PRP), based on the City's ownership and operation of the Site. U.S. EPA sent a special notice letter to the City in January 1995, requesting a "good faith" proposal to continue the Phase II remedial investigation/feasibility study (RI/FS). In February 1995, the City declined the offer to perform the response action. U.S. EPA initiated a fund-lead Phase II RI/FS in March 1995 to further determine the extent of contamination and potential remedies.

### **Basis for Taking Action**

A "No Further Action" ROD was signed on September 27, 1996. U.S. EPA noted that waste material underlay the surface of the Site and that groundwater under the landfill itself did not meet the MCLs for several VOCs.

The ROD stated that No Further Action was required because contamination at the landfill poses no significant risk under the current and reasonable anticipated future land use at this Site. The ROD also stated that although the No Further Action decision is founded on the fact that no significant risk was determined based upon current and reasonable future land use, protections against inappropriate land use are already in place in the form of restrictive covenants enforceable by WDNR.

Because the area was connected to a municipal water supply and there were land use restrictions in place preventing excavation, and given the current land use and the reasonably anticipated land use at the Site, U.S. EPA concluded that there was little risk of exposure to hazardous substances. Consequently, U.S. EPA selected No Further Action as the remedy, but noted in the

ROD that the WDNR AOC requires additional groundwater monitoring to ensure that groundwater conditions at the Site continued to pose no significant risk. The ROD also noted that the no action assumed that the land use restrictions which were assumed to be in place were incorporated into the remedy because the Site does not allow for UU/UE.

#### **IV. Remedial Actions**

##### **Remedial Selections**

In November 1996, the WDNR and the City of Tomah entered into a Consent Order whereby the City of Tomah agreed to do long-term groundwater monitoring for volatile organic compounds. This monitoring included: annual and semi-annual sampling of monitoring wells, and routine (every 5 years) monitoring of the nearby private wells.

A ROD was signed in September 1996 selecting the following remedy:

1. Institutional controls remain in place, to the extent possible, deed and access restrictions and deed notices or advisories for locations with contaminated groundwater;
2. Long-term groundwater monitoring; and
3. No Further Action

##### **Remedial Implementation**

A No Further Action remedy does not require any remedial implementation. However, at this Site, because of an agreement between the City of Tomah and WDNR, the City has conducted periodic groundwater monitoring. But, while the ROD does not require any remedial implementation, it acknowledges that some remedial implementation will take place under a State order.

Results of the groundwater investigation prior to selection of the remedy identified VOCs inside the landfill boundaries. Following selection of the remedy, sampling has taken place in 2000 and 2007. Groundwater data gathered in August 2000 and March 2007 confirmed groundwater on-site and downgradient meets MCLs.

##### **Institutional Controls**

Institutional controls (ICs) are required to ensure the protectiveness of the remedy as is described in the ROD and summarized below. Institutional controls are non-engineered instruments, such as administrative and/or legal controls, that help minimize the potential for exposure to contamination and protect the integrity of the remedy. Compliance with ICs is required to assure long-term protectiveness for any areas which do not allow for unlimited use or unrestricted exposure (UU/UE).

Site Description: The property covers roughly 37.5 acres, with the landfill itself occupying about 15 acres within the boundaries of the Fairgrounds. The landfill area is a grass-covered, open field that is often used as a parking lot during Fairground events. The site is bordered on the north by Grassman Street and a residential area. Fair Street runs along the eastern border, angles across the southeast corner and borders the Fairgrounds along the south. Access to the site is not restricted. With respect to the landfilled area, it continues to be a grassy parking area for Fairground events which is the use it has served for the past 45 years

Decision Document: The No Action ROD, which is discussed further below, states that the City of Tomah has filed a deed restriction and implemented a zoning ordinance that prohibits permits for well operation on the Tomah Fairgrounds property and within a zone that extends 400 feet beyond the northern boundary of the Site. The decision took into account the fact that ICs were already in place in the form of (1) deed restrictions preventing residential use of the Fairground property underlain by waste, and (2) state/municipal restrictions on groundwater wells in the vicinity. Although the “No Action” ROD did not select ICs, they were relied upon in selecting the remedy since the present and future land use were assumed to be of a commercial / industrial nature. Cleanup goals for soil were based on limited commercial/industrial use and for groundwater were based on achieving cleanup standards for UU/UE. The ROD concluded that binding agreements between WDNR and the City of Tomah requiring maintenance of deed restrictions, etc. will continue.

The ROD stated that No Action was required because contamination at the landfill poses no significant risk under the current and reasonable anticipated future land use at this Site. The ROD also stated that although the No Action decision is founded on the fact that no significant risk was determined based upon current and reasonable future land use, protections against inappropriate land use are already in place in the form of restrictive covenants enforceable by WDNR.

Compliance: Based on the Site inspection and data – no inappropriate land or groundwater use was observed. Long-term protectiveness requires compliance with the ICs for the land use restrictions. With respect to ground water, there are three residents who refused to give up their wells and connect to municipal water. However, even though ground water is meeting the MCLs and has done so for the last seven (7) years, waste remains in place; therefore, groundwater continues to be monitored and the groundwater IC objective (i.e., prohibit use for drinking water) remain. With respect to the landfill area, it continues to be a grassy parking area for Fairground events as it has for the past 45 years. Based on inspections, monitoring data and interviews with city officials, there appears to be no inappropriate site and groundwater uses and there is no apparent violation of the ICs.

Therefore, at this time, initial IC evaluation activities have revealed that the remedy is functioning as intended since the property use is not being used in a manner which is inconsistent

with the required use restrictions required or ICs; therefore the remedy is protective in the short term. However, long term protectiveness requires compliance with effective ICs. Therefore, a review of the institutional controls is needed to assure that the remedy continues to function as intended with regard to the ICs and to ensure effective procedures are in-place for long-term stewardship at the Site.

Table 2 summarizes institutional controls for the restricted areas.

**Table 2**

<b>Media, Engineered Controls, &amp; Areas that Do Not Support UU/UE Based on Current Conditions.</b>	<b>IC Objective</b>	<b>Title of Institutional Control Instrument Implemented (note if planned)</b>
<b>Groundwater</b> – State standards have been met however waste remains in place therefore groundwater continues to be monitored.	Groundwater shall not be used as a drinking water source	Restrictive Covenant and Ordinance Under review – planned to be developed within 6 months of 5 Year Review.
<b>Landfill</b> – Area where waste remains in place and capped.	No interference with the cap or other associated remedy components (except routine maintenance). Property can not be used for residential uses.	Restrictive Covenant Under review – planned to be developed within 6 months of 5 Year Review.
<b>Groundwater monitoring wells</b>	No interference with the remedy components (except routine maintenance)	Restrictive Covenant Under review – planned to be developed within 6 months of 5 Year Review.

Maps (paper and GIS versions) which depict the current conditions of the site and depicting physical areas which do not allow for UU/UE, including the information contained in Table 2 will be developed as part of the IC evaluation activities discussed below.

As mentioned above since the site remedy does not allow for UU/UE, and then ICs are necessary to ensure the protectiveness of the remedy. Long-term protectiveness requires compliance with effective ICs. Therefore, the ICs must be evaluated to ensure their effectiveness.

Based upon preliminary IC evaluation activities, the following has been determined. It is unclear if proprietary controls in the form of effective restrictive covenants have been implemented to restrict Site and groundwater uses; therefore, IC evaluation activities need to be conducted to determine whether effective proprietary controls have been implemented. With regard to governmental controls, the Site is zoned commercial/industrial. Also, it has been reported that the City has an ordinance which regulates groundwater wells in the area. The effectiveness of the ordinance and zoning also needs to be evaluated. An IC study will be requested from the PRPs to undertake specific additional IC evaluation activities.

The IC evaluation activities will include the following: confirmation of appropriate and inappropriate property uses to achieve the IC objectives including an analysis of the groundwater situation at the Site, a determination concerning whether site contamination justifies continued restriction of groundwater use, a determination whether an effective restrictive covenant is in place which runs with the land, performance of title work to determine ownership and whether any prior encumbrances could interfere with the restrictions, creation of current conditions maps (paper and GIS versions), and whether effective plans are in place to assure long-term Site stewardship. Once the IC evaluation activities have been completed, an IC Plan will be developed by U.S. EPA within six (6) months of the Five Year Review. The Plan will incorporate the results of the evaluation activities and plan for additional IC activities as needed including planning for long- term stewardship.

### **Operations and Maintenance (O&M)**

The Site remedial decision was “No Further Action” and did not have any O & M component. The recent groundwater monitoring showed that there were no exceedances at any wells for chemicals of concern.

Long-term protectiveness requires compliance with the ICs for the land use restrictions. Groundwater has met the cleanup standard allowing for unlimited use and therefore no ICs are required for groundwater. Compliance with ICs will be accomplished by planning for long-term stewardship which includes maintaining and monitoring effective ICs. To that end, a Plan will be developed to ensure long-term stewardship which includes maintaining and monitoring effective ICs including mechanisms to ensure regular inspections of ICs and an annual certification to U.S. EPA that ICs are in place and effective. Also, a communications plan and utilization of the state one-call system shall be explored.

### **V. Progress Since Last Five-Year Review**

**Table 3: Actions Taken Since the Last Five-Year Review**

<b>Issues from Previous Review</b>	<b>Recommendations/ Follow-up Actions</b>	<b>Party Responsible</b>	<b>Milestone Date</b>	<b>Action Taken and Outcome</b>	<b>Date of Action</b>
Continue monitoring and conducting 5 Year Review	Conduct monitoring	City of Tomah	March 2007	Monitoring resulted in no exceedances	March 2007

This is the second five-year review for the Tomah Fairground Landfill Site. No further remedial actions or enforcement actions have taken place since the initial five-year review. The previous five-year review recommended continued groundwater monitoring because it was required by a State order. The five-year review took note of the requirement and reported the results.



## **VI. Five Year Review Process**

### **Administrative Components**

The Tomah Fairground Landfill Site five-year review was prepared by David Linnear, U.S. EPA Remedial Project Manager. WDNR was notified of the five-year review in 2006.

From January 2007 to June 2007, the Project Manager reviewed documents, data, and developed the second five-year review report.

### **Community Notification and Involvement**

The community was notified of the second five-year review May 2007, by an advertisement in the Tomah Journal. The completed five-year review report and background data will be available in the Site information repository, and the U.S. EPA website for public view. An advertisement notice regarding the five year-review process was placed in the newspaper for public review on May 2007 (see Attachments). No public comments regarding the five-year review have been received.

### **Document Review**

For purposes of this review Tomah Landfill site documents and data reviewed in preparation of this five-year review report includes the following: the 1996 ROD, 2002 Five-Year Review, 2007 groundwater and drinking water sampling activities, and Tomah Landfill correspondence file.

### **Data Review**

In February 2007, U.S EPA notified the City of Tomah that groundwater sampling was required. In March 2007, sampling began. In May 2007, groundwater sampling showed that there were no exceedances.

### **Site Inspections**

The Site inspection was conducted June 12, 2007. U.S. EPA conducted the inspection with the City of Tomah. Groundwater monitoring wells were in place and the Site cover was intact.

## **VII. Technical Assessment**

### **Question A: Is the remedy functioning as intended by the decision document? Yes**

The basis for no action in the decision documents continue to apply to the Site. No activities have been observed that would have violated the intent of the ROD. The ROD selected "No Further Action" based on the RI. The remedy is functioning as intended. A restrictive covenant

is in place that prohibits interference with the landfill cap and industrial use areas; and a groundwater restriction ordinance is currently in place. Based on inspections, monitoring and interviews with city officials, there appears to be compliance with the land and groundwater use restrictions. An IC plan will be developed to evaluate the effectiveness of the existing restrictions to assure that the remedy continues to function as intended.

**Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives (RAOs) used at the time of the remedy selection still valid? Yes**

The property is currently zoned for industrial use and is being used for commercial/industrial purposes. Industrial uses on adjacent parcels are not anticipated to impact the landfill.

There have been no changes in the physical conditions of the Site that would affect the protectiveness of the remedy.

**Changes in Standards and Things to be Considered**

There have been no changes in standards or things to consider that would change the protectiveness of the remedy.

**Changes in Exposure Pathways, Toxicity, and Other Contaminant Characteristics**

There has been no change in exposure pathways, toxicity or other contaminant characteristics that could affect the protectiveness of the remedy. In fact, groundwater contamination has declined such that groundwater now meets MCLs.

**Question C: Has any other information come to light that could call into question the protectiveness of the remedy? No**

There is no other information that calls into question the protectiveness of the remedy.

**Technical Assessment Summary**

After reviewing the residential drinking well sampling data during this review, it is conclusive that the remedy as intended by the ROD remains protective. There have been no changes in the physical conditions of the Site that would affect the protectiveness of the remedy. There is no other information that calls into question the protectiveness of the remedy.

## VIII. Issues

**Table 4: Issues**

Issues	Affects Current Protectiveness (Y/N)	Affects Future Protectiveness (Y/N)
The ICs have not been fully evaluated. A review of the institutional controls is needed to assure that the remedy continues to function as intended with regard to the ICs, including evaluating existing ICs and ensuring effective procedures are in-place for long-term stewardship at the Site.	N	Y
Based upon the IC evaluation activities, an IC Plan is needed to address required follow-up actions in order to assure that the remedy remains protective (including planning for long-term stewardship).	N	Y

## IX. Recommendations and Follow-Up Actions

**Table 5: Recommendations and Follow-up Actions**

Issue	Recommendations and Follow-up Actions	Party Responsible	Oversight Agency	Milestone Date	Affects Protectiveness (Y/N)	
					Current	Future
A review of the institutional controls is needed to assure that the remedy continues to function as intended with regard to the ICs, including evaluating existing ICs and ensuring effective procedures are in-place for long-term stewardship at the Site.	IC evaluation activities will be undertaken	PRP	U. S. EPA	Within 6 months	N	Y

Issue	Recommendations and Follow-up Actions	Party Responsible	Oversight Agency	Milestone Date	Affects Protectiveness (Y/N)	
					Current	Future
Based upon the IC evaluation activities, an IC Plan is needed to address required follow-up actions in order to assure that the remedy remains protective (including planning for long-term stewardship).	Prepare an IC Plan*	U.S. EPA	With input from PRP and State	Within 6 months	N	Y

\*The IC plan will include a provision for evaluating whether effective ICs continue to be implemented, implementing corrective measures where necessary, developing IC maps, and ensuring that effective procedures are in place to ensure regular inspections of ICs at the Site and annual certification to U.S. EPA that ICs are in place and effective, along with the development of a communication plan. The IC plan should be developed within 6 months. The schedule for the remainder of the actions will be determined in the IC plan.

## **X. Protectiveness Statement**

The 'No Further Action' remedy selected in 1996 ROD continues to be protective of human health and the environment in the short term. The existing Site use is consistent with the objectives set forth in the ROD and zoning restrictions and the implemented remedial actions at the Tomah Fairgrounds Site are functioning as intended. Long term protectiveness requires compliance with land use restrictions that prohibit interference with the soil cap and restrict the Site to limited commercial/industrial uses and limit the groundwater use to ensure that the remedy continues to function as intended. Compliance with ICs will be accomplished by planning for long-term stewardship which includes maintaining and monitoring effective ICs.

## **XI. Next Review**

The next five-year review will be completed within five years from the date of this five-year review.

## FIGURES



# Tomah Fairgrounds Superfund Site Monroe County, Wisconsin

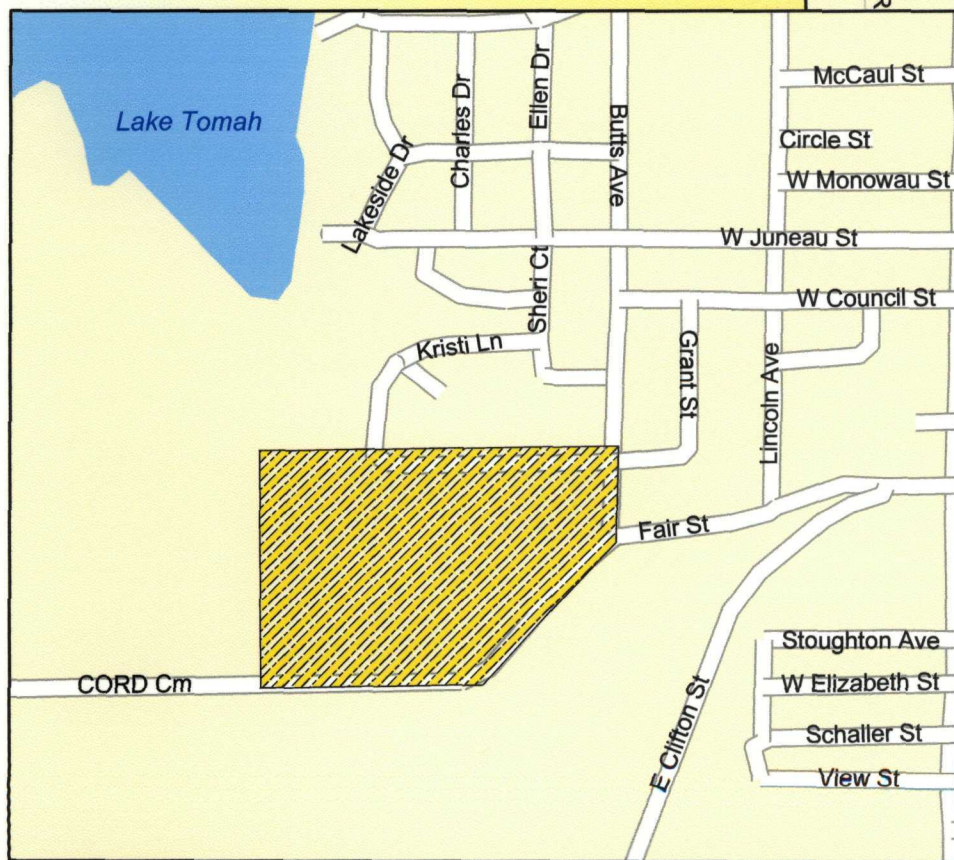
## 1) State



## 2) City of Tomah



## 3) Tomah Fairgrounds Superfund Site

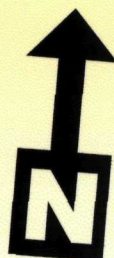
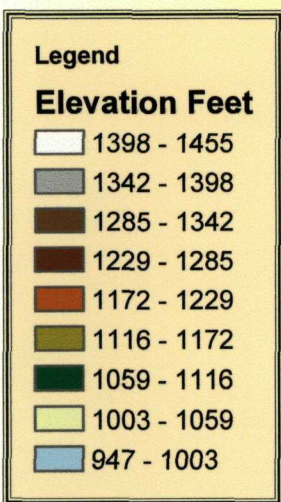


Plot created by David Wilson U.S. EPA Region 5/5/2002

**Figure 1**



# Tomah Fairgrounds Superfund Site 3D Surface Terrain Model



Plot created by David Wilson U.S. EPA Region 5 on 04/2002

**Figure 2**

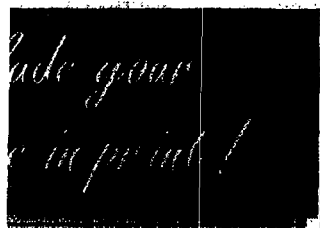
# **ATTACHMENTS**





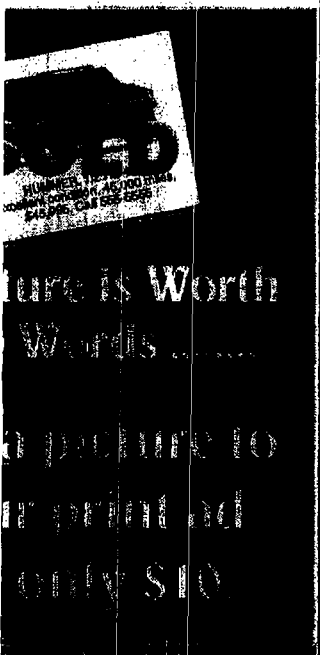
ying in snow was the top entry in the outdoor activities category. The entry  
by Shirley Johnson.

*The Tomah Journal, 5/17/07*



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**EPA to Review  
Tomah Fairgrounds Landfill Site  
Tomah, Wisconsin**

U.S. Environmental Protection Agency has begun a review of the Tomah Fairgrounds Landfill Superfund site. The federal Superfund law requires a review at least every five years at sites where hazardous waste remains on the site. The agency conducts this review to make sure the site is not a threat to people or the environment. This is the second such review.

The city of Tomah used the site for waste disposal until the late 1950s. EPA placed the site on the National Priorities List in 1987 due to concerns about possible soil and ground-water contamination. After an investigation completed in 1996, EPA concluded a soil cleanup was not necessary due to low risks to human health and the environment. Instead, the agency required ground water monitoring to ensure contamination naturally degraded and the placement of deed and access restrictions limiting land use. The site exists as an open field except when used as a parking lot during fairground events. EPA removed the site from the National Priorities List in 2001 when ground water data indicated Wisconsin water quality standards had been met.

During the review, EPA will examine the site and the selected remedy to determine whether the public and environment continues to be protected. EPA will release its findings this summer. Information is available for review at the information repository at the Tomah Public Library, 716 Superior Ave.

EPA invites you to provide information that might be important in this site review. Please contact Briana Bill, community involvement coordinator, EPA (P-19J), 77 W. Jackson Blvd., Chicago, IL 60604; 312-353-6646 or 800-621-8431 Ext. 36646 weekdays 9 a.m. - 4:30 p.m., [bill.briana@epa.gov](mailto:bill.briana@epa.gov). Your information will be most useful to reviewers if received by the end of May.

2006/17811

## Join Us for an Informative Evening Spotlighting **GLOBUS** Vacations

**Thursday, May 24 - 7 p.m.**

In the meeting room at the Ground Round in Tomah

Globus Representative will be on site with a presentation on escorted vacations and to answer your questions.

*Refreshments Provided*

Please RSVP by Monday, May 21 to 372-3520

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Tomah Monitor Herald 5/14/07

2004/5/13

ns that will be available at their runs from 5 to 7:30 p.m., is for nd raffle with Green Bay Packer ch, Trena Conant, Jacob Brown : Wanna and Sara Peardot.

(Tomah Newspapers Photo)

**9**

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Mon-Fri: 3:30, 6:30, 9:30	
Sat-Sun: 12:30, 3:30, 6:30, 9:30	
<b>SPIDER-MAN 3</b>	PG-13
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Sat-Sun: 12:30, 2:50, 5:05, 7:15, 9:30	
<b>WILD HOGS</b>	PG-13
Mon-Fri: 3:05, 5:15, 7:25, 9:35	
Sat-Sun: 12:35, 3:05, 5:15, 7:25, 9:35	

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Parents will have an opportunity to learn more about child development, their preschooler's developmental status, and services available for children. Child Development Day offers the collaborative efforts of community professionals and agencies involved with young children.

This 'free of charge' event will be held **Thursday, May 17, 2007, from 8:30 a.m. to 5:00 p.m. at Tomah Recreation Park Recreation (gold) Building.**

Children will have the opportunity to participate in appropriate developmental activities while parents learn about school and community programs serving families and young children. Representatives from the schools and community agencies will be on hand to answer your questions.

Participating children will receive numerous prizes and gifts. Refreshments will be served.

**For appointments or information call 374-7011**

*Child Development Day is a cooperative, community sponsored event.*

20040135/1

#### ADVERTISEMENT



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*Th - County Focay Shopper East 5/14/07*

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